



1939 125<sup>th</sup> Ave NW  
Watford City ND 58854  
Office 701.842.3315  
[www.targaresources.com](http://www.targaresources.com)

*CERTIFIED MAIL: 7017 1450 0000 9449 6366*  
Return Receipt Requested

January 25, 2018

Adam Rookey  
ND Department of Health  
Division of Air Quality  
918 E. Divide Avenue  
Bismarck, ND 58501-1947

RECEIVED

FEB 5 - 2018

Office of Enforcement  
Compliance & Environmental Justice

**RE: Semiannual Leak Detection and Repair (LDAR) Monitoring Report  
Targa Badlands Little Missouri Gas Plant, T5-O15001  
McKenzie County, North Dakota**

Dear Mr. Rookey:

Find enclosed the semi-annual monitoring report for Targa Badlands Little Missouri Gas Plant I, II, and III. This report covers the period of July 1 – December 31, 2017 per NSPS Subpart OOOO.

Per the reporting requirements specified in 40 CFR 60.636 (c) 1 and 2, during this reporting period there were no (0) pressure relief device leaks detected.

If you have any questions, or need additional information, please contact me via email at [mitchellanderson@targaresources.com](mailto:mitchellanderson@targaresources.com) or cellular phone (701) 770-0115.

Sincerely,

(b) (6)

Mitchell W. Anderson  
Sr. Environmental Specialist

cc: Cynthia Reynolds – USEPA Region 8 - Denver, CO [*Certified Mail: 7017 1450 0000 9449 6380*]  
David Low, Targa Badlands Area Manager – Watford City, ND  
Shane Tribe, Targa ESH Manager – Denton, TX



January 19, 2018

Mr. Mitch Anderson  
Senior Environmental Specialist  
Targa Resources  
1939 125<sup>th</sup> Avenue NW  
Watford City, ND 58854-9248

RE: Semiannual Leak Detection and Repair Monitoring Report  
Little Missouri I Natural Gas Processing Facility (Little Missouri I), McKenzie County, North  
Dakota

Dear Mr. Anderson:

During July 1, 2017 through December 31, 2017, Trihydro Corporation (Trihydro) completed routine monitoring for fugitive emissions as required by the Leak Detection and Repair (LDAR) program for Little Missouri I natural gas processing facility located in McKenzie County, ND. The monitoring activities were completed to satisfy the requirements of the New Source Performance Standards (NSPS) Subpart KKK, Subpart OOOO, and Subpart OOOOa regulations. This report serves as the report required for submittal to the regulatory agencies.

### **NSPS Requirements**

NSPS Subparts KKK, OOOO, and OOOOa require that a semiannual report be submitted for each process unit and month within the reporting period. The semiannual report must include:

- The number of valves, pressure relief devices (PRDs), pumps, compressors, and connectors for which leaks were detected.
- The number of valves, PRDs, pumps, compressors, and connectors for which leaks were not repaired as required or placed on the delay of repair (DOR) list.
- The facility is required to report the reasons for each DOR, the dates of process unit shutdowns that occurred within the reporting period, as well as revisions to the component inventory.

### **Results**

In accordance with the United States Environmental Protection Agency Method 21, Trihydro personnel monitored components in volatile organic compound service or wet gas service. The Little Missouri I facility currently has nine process units subject to the regulations. These process units, including the number of components and leaks detected during the reporting period, are as follows:



Mr. Mitch Anderson  
January 19, 2018  
Page 2

Process Unit	Subpart	Components	Leaks Detected
Cryogenic Unit	KKK	266	1
Deethanizer Skid	KKK	66	0
Glycol Skid	KKK	157	2
Loading	KKK	50	0
Propane Unit	KKK	16	0
Flare	OOOO	65	0
Inlet	OOOO	782	13
Condensate	OOOOa	3672	10
Tank Farm	OOOOa	1972	13

There were 16 components in the Subpart KKK and Subpart OOOO regulated units found to be leaking at the Little Missouri I facility during the reporting period. The number of valves, PRDs, pumps, compressors, and connectors for which leaks were detected during the reporting period are presented in Attachment A. It should be noted that 1 component was added to the DOR list during the reporting period. The number of component revisions, including 9 added and 4 removed from the inventory during the reporting period, are also included in the tables.

The condensate and tank farm units at the Little Missouri I facility are Subpart OOOOa regulated units, which are reported directly to EPA. There were 23 components found to be leaking in these units during the reporting period. Included in Attachment B is the report table as provided by the EPA for CDX reporting.

The facility had no scheduled process unit shutdowns meeting the definition of § 60.481 during the reporting period.

If you have any questions or comments, please do not hesitate to contact Tracy Schneider at [tschneider@trihydro.com](mailto:tschneider@trihydro.com) or Kyle Haag at [khaag@trihydro.com](mailto:khaag@trihydro.com) or call us at (701) 204-0065.

Sincerely,  
Trihydro Corporation

(b) (6)

Tracy Schneider  
Team Leader – LDAR Services

(b) (6)

Kyle Haag  
Project Manager

19T-001-007

Attachments

**ATTACHMENT A**

**EQUIPMENT LEAK REPORT &  
DELAY OF REPAIR COMPONENTS**

# Semi-Annual Report

From: 7/1/2017 To: 12/31/2017, Rule: NSPS - KKK

Targa Resources - Targa 1

Unit: CRYO

# Components:	Valves:	266	Pumps:	0	Compressors:	0	PRVs:	0
# Added:		0		0		0		0
# Perm. OOS:		0		0		0		0
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
July 2017	0	0	0	0	0	0	0	0
August 2017	0	0	0	0	0	0	0	0
September 2017	0	0	0	0	0	0	0	0
October 2017	1	0	0	0	0	0	0	0
November 2017	0	0	0	0	0	0	0	0
December 2017	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:

No Late Repairs.

# Semi-Annual Report

From: 7/1/2017 To: 12/31/2017, Rule: NSPS - KKK

Targa Resources - Targa 1

Unit: DEETH SK

# Components:	Valves:	64	Pumps:	2	Compressors:	0	PRVs:	0
# Added:		0		0		0		0
# Perm. OOS:		0		0		0		0
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
July 2017	0	0	0	0	0	0	0	0
August 2017	0	0	0	0	0	0	0	0
September 2017	0	0	0	0	0	0	0	0
October 2017	0	0	0	0	0	0	0	0
November 2017	0	0	0	0	0	0	0	0
December 2017	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:

No Late Repairs.

# Semi-Annual Report

From: 7/1/2017 To: 12/31/2017, Rule: NSPS - KKK

Targa Resources - Targa 1

Unit:

GLYCOL SKID

# Components:	Valves:	148	Pumps:	8	Compressors:	0	PRVs:	1
# Added:		0		0		0		0
# Perm. OOS:		0		0		0		0
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
July 2017	0	0	1	0	0	0	0	0
August 2017	0	0	0	0	0	0	0	0
September 2017	0	0	1	0	0	0	0	0
October 2017	0	0	0	0	0	0	0	0
November 2017	0	0	0	0	0	0	0	0
December 2017	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:

No Late Repairs.

# Semi-Annual Report

From: 7/1/2017 To: 12/31/2017, Rule: NSPS - KKK

Targa Resources - Targa 1

Unit:

LOADING

# Components:	Valves:	50	Pumps:	0	Compressors:	0	PRVs:	0
# Added:		0		0		0		0
# Perm. OOS:		0		0		0		0
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
July 2017	0	0	0	0	0	0	0	0
August 2017	0	0	0	0	0	0	0	0
September 2017	0	0	0	0	0	0	0	0
October 2017	0	0	0	0	0	0	0	0
November 2017	0	0	0	0	0	0	0	0
December 2017	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:

No Late Repairs.

# Semi-Annual Report

From: 7/1/2017 To: 12/31/2017, Rule: NSPS - KKK

Targa Resources - Targa 1

Unit: PROPANE

# Components:	Valves:	15	Pumps:	0	Compressors:	0	PRVs:	1
# Added:		0		0		0		0
# Perm. OOS:		0		0		0		0
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
July 2017	0	0	0	0	0	0	0	0
August 2017	0	0	0	0	0	0	0	0
September 2017	0	0	0	0	0	0	0	0
October 2017	0	0	0	0	0	0	0	0
November 2017	0	0	0	0	0	0	0	0
December 2017	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:

No Late Repairs.

# Semi-Annual Report

From: 7/1/2017 To: 12/31/2017, Rule: NSPS - OOOO

Targa Resources - Targa 1

Unit:

FLARE

Count:	Valves: 27		Pumps: 3		Compressors: 0		PRVs: 0		Connectors: 35	
# Added:	0		0		0		0		0	
# Removed:	1		0		0		0		3	
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
Jul 2017	0	0	0	0	0	0	0	0	0	0
Aug 2017	0	0	0	0	0	0	0	0	0	0
Sep 2017	0	0	0	0	0	0	0	0	0	0
Oct 2017	0	0	0	0	0	0	0	0	0	0
Nov 2017	0	0	0	0	0	0	0	0	0	0
Dec 2017	0	0	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:

No Late Repairs.

# Semi-Annual Report

From: 7/1/2017 To: 12/31/2017, Rule: NSPS - OOOO

Targa Resources - Targa 1

Unit: INLET

Count:	Valves:	282	Pumps:	0	Compressors:	0	PRVs:	0	Connectors:	500
# Added:		3		0		0		0		6
# Removed:		0		0		0		0		0
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
Jul 2017	2	0	0	0	0	0	0	0	0	0
Aug 2017	0	0	0	0	0	0	0	0	8	1
Sep 2017	0	0	0	0	0	0	0	0	0	0
Oct 2017	3	0	0	0	0	0	0	0	0	0
Nov 2017	0	0	0	0	0	0	0	0	0	0
Dec 2017	0	0	0	0	0	0	0	0	0	0

Delay of Repairs:

Equipment:	Tag:	Leak Date:	Repair Date:	Type:	Reason:
NA	1293-002	8/16/2017	Not Repaired	CON	REPAIR INFEASIBLE W/O SHUTDOWN

Late Repairs:

No Late Repairs.

**ATTACHMENT B**  
**EPA CDX REPORTING TABLE**

The asterisk (\*) next to each field indicates that the corresponding field is required.

## EQUIPMENT INFORMATION

Facility Record No. * (Select from dropdown list)	Month Identification* (Select from dropdown list)	Number of pressure relief devices for which leaks were detected * (60.5422a)(i)(1))	Number of pressure relief devices for which leaks were not repaired * (60.5422a)(i)(2))	Number of valves for which leaks were detected * (60.487a)(i)(2)(i))	Number of valves for which leaks were not repaired * (60.487a)(i)(2)(ii))	Number of pumps for which leaks were detected * (60.487a)(i)(2)(iii))	Number of pumps for which leaks were not repaired * (60.487a)(i)(2)(iv))	Number of connectors for which leaks were detected * (60.487a)(i)(2)(v)) (60.5422a(a))	Number of connectors for which leaks were not repaired * (60.487a)(i)(2)(vi)) (60.5422a(a))
1	July	0	0	1	0	0	0	9	0
1	August	0	0	0	0	0	0	0	0
1	September	0	0	0	0	0	0	6	0
1	October	0	0	5	4	1	0	1	0
1	November	0	0	0	0	0	0	0	0
1	December	0	0	0	0	0	0	0	0

The asterisk (\*) next to each field indicates that the corresponding field is required.

FACILITY INFORMATION									ADDITIONAL INFORMATION			
Facility Record No. * (Field value will automatically generate.)	Facility Name *	Address of Processing Plant*	Address 2	City *	County *	State Abbreviation*	Zip Code *	Responsible Agency Facility ID (State Facility Identifier)	Beginning Date of Reporting Period *	Ending Date of Reporting Period *	Please enter any additional information	Enter associated file name reference.
e.g.: ABC Company	e.g.: 123 Main Street	e.g.: Suite 100	e.g.: Brooklyn	e.g.: Kings County	e.g.: NY	e.g.: 11221			e.g.: 01/01/2016	e.g.: 06/30/2016	Affected Process Units	e.g.: filename.pdf
1	Little Missouri I	1939 125th Avenue NW		Watford Ciy	Mckenzie	ND	58854		07/01/2017	12/31/2017	Condensate - Valves=1140, Pumps=11, Compressors=0, PRVs=41, Connectors=2518. Tank Farm - Valves=560, Pumps=6, PRVs=36, Connectoros=1374.	



January 19, 2018

Mr. Mitch Anderson  
Senior Environmental Specialist  
Targa Resources  
1939 125<sup>th</sup> Ave. NW  
Watford City, ND 58854

RE: Semiannual Leak Detection and Repair Monitoring Report  
Little Missouri II Natural Gas Processing Facility (Little Missouri II), McKenzie County, North Dakota

Dear Mr. Anderson:

During July 1, 2017 through December 31, 2017, Trihydro Corporation (Trihydro) completed routine monitoring for fugitive emissions as required by the Leak Detection and Repair (LDAR) program for Little Missouri II natural gas processing facility located in McKenzie County, ND. The monitoring activities were completed to satisfy the requirements of the New Source Performance Standards (NSPS) Subpart OOOO regulation. This report serves as the report required for submittal to the regulatory agencies.

### **NSPS Requirements**

NSPS Subpart OOOO requires that a semiannual report be submitted for each process unit and month within the reporting period. The semiannual report must include:

- The number of valves, pressure relief devices (PRDs), pumps, compressors, and connectors for which leaks were detected.
- The number of valves, PRDs, pumps, compressors, and connectors for which leaks were not repaired as required or placed on the delay of repair (DOR) list.
- The facility is required to report the reasons for each DOR, the dates of process unit shutdowns that occurred within the reporting period, as well as revisions to the component inventory.

### **Results**

In accordance with United States Environmental Protection Agency Method 21, Trihydro personnel monitored components in volatile organic compound service or in wet gas service. The Little Missouri II facility currently has seven process units subject to the NSPS regulation. These process units, including the number of regulated components and leaks detected during the reporting period, are as follows:



Mr. Mitch Anderson  
January 19, 2018  
Page 2

Process Unit	NSPS	Components	Leaks Detected
Condensate	0000	1,670	4
Cryo	0000	1,554	12
Deethanizer	0000	853	5
Glycol Skid	0000	687	2
Inlet	0000	76	0
Methanol	0000	107	0
Propane	0000	258	0

There were 23 components found to be leaking at the Little Missouri II facility during the reporting period. The process units, including the number of leaks detected during the reporting period, are presented in Attachment A. It should be noted that two components were added to the DOR list during the reporting period and is also presented in Attachment A. The number of component revisions, included one added to the inventory during the reporting period, are also included in the tables.

The facility had no scheduled process unit shutdowns meeting the definition of § 60.481 during the reporting period.

If you have any questions or comments, please do not hesitate to contact Tracy Schneider at [tschneider@trihydro.com](mailto:tschneider@trihydro.com) or Kyle Haag at [khaag@trihydro.com](mailto:khaag@trihydro.com) or call us at (701) 204-0065.

Sincerely,  
Trihydro Corporation

(b) (6)

Tracy Schneider  
Team Leader – LDAR Services

19T-001-007

Attachment

(b) (6)

Kyle Haag  
Project Manager

**ATTACHMENT A**

**EQUIPMENT LEAK REPORT &  
DELAY OF REPAIR COMPONENTS**



# Semi-Annual Report

From: 7/1/2017 To: 12/31/2017, Rule: NSPS - OOOO

Targa Resources - Targa 2

Unit: CONDENSATE

Count:	Valves:	624	Pumps:	3	Compressors:	0	PRVs:	0	Connectors:	1043
# Added:		1		0		0		0		0
# Removed:		0		0		0		0		0
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
Jul 2017	0	0	0	0	0	0	0	0	0	0
Aug 2017	0	0	0	0	0	0	0	0	3	0
Sep 2017	1	0	0	0	0	0	0	0	0	0
Oct 2017	0	0	0	0	0	0	0	0	0	0
Nov 2017	0	0	0	0	0	0	0	0	0	0
Dec 2017	0	0	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:

No Late Repairs.



# Semi-Annual Report

From: 7/1/2017 To: 12/31/2017, Rule: NSPS - OOOO

Targa Resources - Targa 2

Unit: CRYO

Count:	Valves:	478	Pumps:	0	Compressors:	0	PRVs:	3	Connectors:	1073
# Added:		0		0		0		0		0
# Removed:		0		0		0		0		0
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
Jul 2017	0	0	0	0	0	0	0	0	0	0
Aug 2017	0	0	0	0	0	0	0	0	5	0
Sep 2017	1	0	0	0	0	0	0	0	1	1
Oct 2017	0	0	0	0	0	0	0	0	0	0
Nov 2017	0	0	0	0	0	0	0	0	0	0
Dec 2017	5	0	0	0	0	0	0	0	0	0

## Delay of Repairs:

Equipment:	Tag:	Leak Date:	Repair Date:	Type:	Reason:
NA	90699-000	9/9/2017	Not Repaired	CON	REPAIR INFEASIBLE W/O SHUTDOWN

## Late Repairs:

No Late Repairs.



# Semi-Annual Report

From: 7/1/2017 To: 12/31/2017, Rule: NSPS - OOOO

Targa Resources - Targa 2

Unit:

DEETH SK

Count:	Valves:	317	Pumps:	2	Compressors:	0	PRVs:	0	Connectors:	534
# Added:		0		0		0		0		0
# Removed:		0		0		0		0		0
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
Jul 2017	0	0	0	0	0	0	0	0	0	0
Aug 2017	1	0	0	0	0	0	0	0	0	0
Sep 2017	1	0	0	0	0	0	0	0	0	0
Oct 2017	0	0	0	0	0	0	0	0	0	0
Nov 2017	0	0	0	0	0	0	0	0	0	0
Dec 2017	3	1	0	0	0	0	0	0	0	0

## Delay of Repairs:

Equipment:	Tag:	Leak Date:	Repair Date:	Type:	Reason:
NA	75449-000	12/12/2017	Not Repaired	VLV	REPAIR INFEASIBLE W/O SHUTDOWN

## Late Repairs:

No Late Repairs.



# Semi-Annual Report

From: 7/1/2017 To: 12/31/2017, Rule: NSPS - OOOO

Targa Resources - Targa 2

Unit: GLY SKID

Count:	Valves:	209	Pumps:	4	Compressors:	0	PRVs:	0	Connectors:	474
# Added:		0		0		0		0		0
# Removed:		0		0		0		0		0
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
Jul 2017	1	0	0	0	0	0	0	0	0	0
Aug 2017	0	0	0	0	0	0	0	0	0	0
Sep 2017	0	0	0	0	0	0	0	0	0	0
Oct 2017	0	0	0	0	0	0	0	0	0	0
Nov 2017	0	0	0	0	0	0	0	0	0	0
Dec 2017	1	0	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:

No Late Repairs.



# Semi-Annual Report

From: 7/1/2017 To: 12/31/2017, Rule: NSPS - OOOO

Targa Resources - Targa 2

Unit: INLET

Count:	Valves:	53	Pumps:	0	Compressors:	0	PRVs:	0	Connectors:	23
# Added:		0		0		0		0		0
# Removed:		0		0		0		0		0
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
Jul 2017	0	0	0	0	0	0	0	0	0	0
Aug 2017	0	0	0	0	0	0	0	0	0	0
Sep 2017	0	0	0	0	0	0	0	0	0	0
Oct 2017	0	0	0	0	0	0	0	0	0	0
Nov 2017	0	0	0	0	0	0	0	0	0	0
Dec 2017	0	0	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:

No Late Repairs.



# Semi-Annual Report

From: 7/1/2017 To: 12/31/2017, Rule: NSPS - OOOO

Targa Resources - Targa 2

Unit: METHANOL

Count:	Valves:	13	Pumps:	3	Compressors:	0	PRVs:	0	Connectors:	91
# Added:		0		0		0		0		0
# Removed:		0		0		0		0		0
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
Jul 2017	0	0	0	0	0	0	0	0	0	0
Aug 2017	0	0	0	0	0	0	0	0	0	0
Sep 2017	0	0	0	0	0	0	0	0	0	0
Oct 2017	0	0	0	0	0	0	0	0	0	0
Nov 2017	0	0	0	0	0	0	0	0	0	0
Dec 2017	0	0	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:

No Late Repairs.



# Semi-Annual Report

From: 7/1/2017 To: 12/31/2017, Rule: NSPS - 0000

Targa Resources - Targa 2

Unit: PROPANE

Count:	Valves:	68	Pumps:	1	Compressors:	0	PRVs:	0	Connectors:	189
# Added:		0		0		0		0		0
# Removed:		0		0		0		0		0
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
Jul 2017	0	0	0	0	0	0	0	0	0	0
Aug 2017	0	0	0	0	0	0	0	0	0	0
Sep 2017	0	0	0	0	0	0	0	0	0	0
Oct 2017	0	0	0	0	0	0	0	0	0	0
Nov 2017	0	0	0	0	0	0	0	0	0	0
Dec 2017	0	0	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:

No Late Repairs.



January 19, 2018

Mr. Mitch Anderson  
Senior Environmental Specialist  
Targa Resources  
1939 125<sup>th</sup> Avenue NW  
Watford City, ND 58854

RE: Semiannual Leak Detection and Repair Monitoring Report  
Little Missouri III Natural Gas Processing Facility (Little Missouri III), McKenzie County, North Dakota

Dear Mr. Anderson:

During July 1, 2017 through December 31, 2017, Trihydro Corporation (Trihydro) completed routine monthly monitoring for fugitive emissions as required by the Leak Detection and Repair (LDAR) program for Little Missouri III natural gas processing facility, including the Smokey Compressor Station, located in McKenzie County, ND. The monitoring activities were completed to satisfy the requirements of the New Source Performance Standards (NSPS) Subpart OOOO and National Emission Standards for Hazardous Air Pollutants (NESHAP) Maximum Achievable Control Technology (MACT) Subpart HH regulations. This report serves as the report required for submittal to the regulatory agencies.

### **Regulatory Requirements**

NSPS Subpart OOOO and NESHAP MACT Subpart HH require that a semiannual report be submitted for each process unit and month within the reporting period. The semiannual report must include:

- Number of valves, pressure relief devices (PRDs), pumps, compressors, and connectors for which leaks were detected.
- The number of valves, PRDs, pumps, compressors, and connectors for which leaks were not repaired as required or placed on the delay of repair (DOR) list.
- The facility is required to report the reasons for each DOR, the dates of process unit shutdowns that occurred within the reporting period, as well as revisions to the component inventory.

### **Results**

In accordance with the United States Environmental Protection Agency Method 21, Trihydro personnel monitored components in volatile organic compound (VOC), hazardous air pollutant (HAP), or wet gas service. The Little Missouri III facility currently has nine process units. These process units, including the number of components and leaks detected during the initial reporting period, are as follows:



Mr. Mitch Anderson  
January 19, 2018  
Page 2

Process Unit	Subpart	Components	Leaks Detected
Condensate	0000	2,157	0
Cryo	0000	1,242	13
Flare	0000	283	0
Inlet	0000	142	0
Methanol	0000	392	0
Propane	0000	188	1
Smokey Compressor Station	0000	1,727	5
Tank Farm	0000	275	0
Smokey Compressor Station	HH	322	2

There were 21 components found to be leaking at the Little Missouri III facility during the reporting period. The process units, including number of leaks detected during the reporting period, are presented in Attachments A. It should be noted that one component was added to the DOR list during the reporting period and is presented in Attachment A. There were no component revisions from the inventory during the reporting period.

The facility had no scheduled process unit shutdowns meeting the definition of § 60.481 during the reporting period.

If you have any questions or comments, please do not hesitate to contact Tracy Schneider at [tschneider@trihydro.com](mailto:tschneider@trihydro.com) or Kyle Haag at [khaag@trihydro.com](mailto:khaag@trihydro.com) or call us at (701) 204-0065.

Sincerely,  
Trihydro Corporation

(b) (6)

Tracy Schneider  
Team Leader – LDAR Services

(b) (6)

Kyle Haag  
Project Manager

19T-001-007

Attachment

**ATTACHMENT A**

**EQUIPMENT LEAK REPORT &  
DELAY OF REPAIR COMPONENTS**



# Semi-Annual Report

From: 7/1/2017 To: 12/31/2017, Rule: NSPS - OOOO

Targa Resources - Targa 3

Unit: CONDENSATE

Count:	Valves:	700	Pumps:	4	Compressors:	2	PRVs:	1	Connectors:	1450
# Added:		0		0		0		0		0
# Removed:		0		0		0		0		0
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
Jul 2017	0	0	0	0	0	0	0	0	0	0
Aug 2017	0	0	0	0	0	0	0	0	0	0
Sep 2017	0	0	0	0	0	0	0	0	0	0
Oct 2017	0	0	0	0	0	0	0	0	0	0
Nov 2017	0	0	0	0	0	0	0	0	0	0
Dec 2017	0	0	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:

No Late Repairs.



# Semi-Annual Report

From: 7/1/2017 To: 12/31/2017, Rule: NSPS - OOOO

Targa Resources - Targa 3

Unit: CRYO

Count:	Valves:	488	Pumps:	5	Compressors:	2	PRVs:	8	Connectors:	739
# Added:		0		0		0		0		0
# Removed:		0		0		0		0		0
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
Jul 2017	0	0	0	0	1	1	0	0	0	0
Aug 2017	0	0	0	0	0	0	0	0	0	0
Sep 2017	0	0	0	0	0	0	0	0	0	0
Oct 2017	0	0	1	0	0	0	0	0	9	0
Nov 2017	1	0	0	0	0	0	0	0	1	0
Dec 2017	0	0	0	0	0	0	0	0	0	0

## Delay of Repairs:

Equipment:	Tag:	Leak Date:	Repair Date:	Type:	Reason:
NA	145703-000	7/25/2017	Not Repaired	COMP R	REPAIR INFEASIBLE W/O SHUTDOWN

## Late Repairs:

No Late Repairs.



# Semi-Annual Report

From: 7/1/2017 To: 12/31/2017, Rule: NSPS - OOOO

Targa Resources - Targa 3

Unit: FLARE

Count:	Valves:	117	Pumps:	6	Compressors:	0	PRVs:	0	Connectors:	160
# Added:		0		0		0		0		0
# Removed:		0		0		0		0		0
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
Jul 2017	0	0	0	0	0	0	0	0	0	0
Aug 2017	0	0	0	0	0	0	0	0	0	0
Sep 2017	0	0	0	0	0	0	0	0	0	0
Oct 2017	0	0	0	0	0	0	0	0	0	0
Nov 2017	0	0	0	0	0	0	0	0	0	0
Dec 2017	0	0	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:

No Late Repairs.



# Semi-Annual Report

From: 7/1/2017 To: 12/31/2017, Rule: NSPS - OOOO

Targa Resources - Targa 3

Unit: INLET

Count:	Valves:	68	Pumps:	0	Compressors:	0	PRVs:	2	Connectors:	72
# Added:		0		0		0		0		0
# Removed:		0		0		0		0		0
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
Jul 2017	0	0	0	0	0	0	0	0	0	0
Aug 2017	0	0	0	0	0	0	0	0	0	0
Sep 2017	0	0	0	0	0	0	0	0	0	0
Oct 2017	0	0	0	0	0	0	0	0	0	0
Nov 2017	0	0	0	0	0	0	0	0	0	0
Dec 2017	0	0	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:

No Late Repairs.



# Semi-Annual Report

From: 7/1/2017 To: 12/31/2017, Rule: NSPS - OOOO

Targa Resources - Targa 3

Unit: METHANOL

Count:	Valves:	26	Pumps:	9	Compressors:	0	PRVs:	0	Connectors:	357
# Added:		0		0		0		0		0
# Removed:		0		0		0		0		0
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
Jul 2017	0	0	0	0	0	0	0	0	0	0
Aug 2017	0	0	0	0	0	0	0	0	0	0
Sep 2017	0	0	0	0	0	0	0	0	0	0
Oct 2017	0	0	0	0	0	0	0	0	0	0
Nov 2017	0	0	0	0	0	0	0	0	0	0
Dec 2017	0	0	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:

No Late Repairs.



# Semi-Annual Report

From: 7/1/2017 To: 12/31/2017, Rule: NSPS - OOOO

Targa Resources - Targa 3

Unit: PROPANE

Count:	Valves:	85	Pumps:	0	Compressors:	1	PRVs:	0	Connectors:	102
# Added:		0		0		0		0		0
# Removed:		0		0		0		0		0
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
Jul 2017	0	0	0	0	0	0	0	0	0	0
Aug 2017	0	0	0	0	0	0	0	0	1	0
Sep 2017	0	0	0	0	0	0	0	0	0	0
Oct 2017	0	0	0	0	0	0	0	0	0	0
Nov 2017	0	0	0	0	0	0	0	0	0	0
Dec 2017	0	0	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:

No Late Repairs.



# Semi-Annual Report

From: 7/1/2017 To: 12/31/2017, Rule: NSPS - OOOO

Targa Resources - Targa 3

Unit:

SMOKEY COMP STATION

Count:	Valves:	371	Pumps:	6	Compressors:	3	PRVs:	9	Connectors:	1338
# Added:		0		0		0		0		0
# Removed:		0		0		0		0		0
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
Jul 2017	0	0	0	0	0	0	0	0	0	0
Aug 2017	0	0	0	0	0	0	0	0	0	0
Sep 2017	2	0	0	0	0	0	0	0	0	0
Oct 2017	2	0	0	0	0	0	0	0	0	0
Nov 2017	0	0	0	0	0	0	0	0	0	0
Dec 2017	1	0	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:

No Late Repairs.



# Semi-Annual Report

From: 7/1/2017 To: 12/31/2017, Rule: NSPS - OOOO

Targa Resources - Targa 3

Unit: TANK FARM

Count:	Valves:	66	Pumps:	0	Compressors:	0	PRVs:	0	Connectors:	209
# Added:		0		0		0		0		0
# Removed:		0		0		0		0		0
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
Jul 2017	0	0	0	0	0	0	0	0	0	0
Aug 2017	0	0	0	0	0	0	0	0	0	0
Sep 2017	0	0	0	0	0	0	0	0	0	0
Oct 2017	0	0	0	0	0	0	0	0	0	0
Nov 2017	0	0	0	0	0	0	0	0	0	0
Dec 2017	0	0	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:

No Late Repairs.



# Semi-Annual Report

From: 7/1/2017 To: 12/31/2017, Rule: MACTHH

Targa Resources - Targa 3

Unit:

SMOKEY COMP STATION

Count:	Valves:	44	Pumps:	2	Compressors:	0	PRVs:	4	Connectors:	272
# Added:		0		0		0		0		0
# Removed:		0		0		0		0		0
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
Jul 2017	0	0	0	0	0	0	0	0	0	0
Aug 2017	0	0	0	0	0	0	0	0	0	0
Sep 2017	1	0	0	0	0	0	0	0	0	0
Oct 2017	1	0	0	0	0	0	0	0	0	0
Nov 2017	0	0	0	0	0	0	0	0	0	0
Dec 2017	0	0	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:

No Late Repairs.